

November 15, 2014

Mr. James Saric
Remedial Project Manager
USEPA Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3511

Subject: Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Supplemental Remedial Investigations/Feasibility Studies
Monthly Progress Report, October 2014

Dear Jim:

Attached is the 92nd monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site (Site) Supplemental Remedial Investigations/Feasibility Studies (SRI/FS). The monthly progress report is submitted per Paragraph 37 of the February 2007 Administrative Settlement Agreement and Order on Consent (AOC), Docket No. V-W-07-C-864, and Section 7.1 of the associated Statement of Work (SOW). This report is also submitted per Paragraph 19a of the 2007 AOC for Removal Action (Docket No. V-W-07-C-863) and Paragraph 19a of the 2009 AOC for Removal Action (Docket No. V-W-09-C-925).

If you have any questions, please do not hesitate to contact me.

Sincerely,



L. Chase Fortenberry, PG
Senior Remediation Project Manager
Environmental Engineering, Environmental Affairs
Georgia-Pacific LLC

Attachments

cc: Michael Berkoff, USEPA
Ramon Mendoza, USEPA
Paul Bucholtz, MDEQ
Judith Alfano, MDEQ

Sharon Hanshue, MDNR
Mark Mills, MDNR
Jeff Keiser, CH2M HILL
Todd King, CDM-Smith
Todd Goeks, NOAA
Julie Sims, NOAA
Lisa Williams, USFWS
Richard Gay, Weyerhaeuser Company
Martin Lebo, Ph.D., Weyerhaeuser Company
Kathy Huibregtse, ENVIRON
Garry Griffith, P.E., Georgia-Pacific LLC
Garret E. Bondy, P.E., AMEC E&I, Inc.

**Monthly Progress Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site SRI/FS**

REPORT #92, OCTOBER 2014

Significant Developments and Activities during the Period:

- On October 1, 2014, MDEQ sent an email to AMEC commenting on the fish trend projections and years to reach fish tissue goals included in the *Area 1 FS*.
- On October 6, 2014, USEPA sent a letter to Georgia-Pacific granting Georgia-Pacific's September 15, 2014 request for extension of the *Draft Area 2 SRI Report*. The letter indicated that the revised *Draft Area 2 SRI Report* would be due for resubmittal to USEPA 60 days after receipt of USEPA's comments on the non-PCB constituent screening document.
- On October 7, 2014, AMEC, on behalf of Georgia-Pacific, sent USEPA and MDEQ an additional figure to supplement the August 1, 2014 *Draft Area 2 ASTM*.
- On October 8, 2014, USEPA sent an email to Georgia-Pacific requesting Area 3 data to support evaluation of a potential Area 3 Time Critical Removal Action (TCRA). The data files were sent to USEPA by AMEC on October 13, 2014.
- On October 15, 2014, Georgia-Pacific, USEPA, MDEQ, and their consultants participated in a conference call meeting to discuss MDEQ's October 1, 2014 email to AMEC.
- On October 16, 2014, AMEC, on behalf of Georgia-Pacific, submitted the *Draft Multi-Area Quality Assurance Project Plan – Revision 1, Addendum 1* for OU-5 for agency review.
- On October 20, 2014, AMEC, on behalf of Georgia-Pacific, submitted a draft scope of work to USEPA and MDEQ for preliminary, quantitative risk assessment for non-PCB constituents associated with human ingestion of fish and contact with soil in Areas 1-3.
- On October 24, 2014, Georgia-Pacific, USEPA, MDEQ, and their consultants participated in a conference call meeting to discuss preliminary evaluation of risk associated with ingestion of deer meat.
- On October 30, 2014, AMEC, on behalf of Georgia-Pacific, submitted to USEPA and MDEQ a preliminary, draft evaluation of risk associated with ingestion of deer meat.
- On October 30, 2014, AMEC, on behalf of Georgia-Pacific, submitted an email response to MDEQ's October 1, 2014 email commenting on fish trend projections included in the *Area 1 FS*.
- On October 31, 2014, AMEC, on behalf of Georgia-Pacific, submitted the *Final Area 4 Field Sampling Plan* for agency review.
- Georgia-Pacific awaits the following:
 - MDEQ's complete response to the January 9, 2013 Freedom of Information Act request.
 - USEPA response to June 25, 2014 Plainwell TCRA letter requesting elimination of the financial assurance requirement associated with the Plainwell No. 2 Dam TCRA AOC.

Data Collected and Field Activities Conducted during the Period

- Georgia-Pacific and AMEC began Area 4 SRI/FS sample collection and survey activities on September 2, 2014. Activities were completed on October 3, 2014.
- Georgia-Pacific, MDEQ, MDNR, and AMEC began river-wide fish collection and survey activities on September 29, 2014. Activities were completed on October 28, 2014.

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Laboratory Data Received during the Period

- Georgia-Pacific is in the process of receiving and validating analytical data for the soil and sediment samples collected during completion of the *Area 4 Field Sampling Plan* activities. It is anticipated that the laboratory data will be provided for agency review with the monthly progress reports upon completion of validation.

Problems

- None.

Actions Taken to Correct Problems

- NA.

Developments Anticipated during the Next Two Reporting Periods

- Georgia-Pacific anticipates continued discussions with USEPA, MDEQ, and their consultants through work group meetings for protocols related to LTM sampling, Area 1 floodplain sampling, and SRI hydrodynamic and conceptual site modeling.